

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:)	Chapter 11
)	
DOUBLE HELIX CORPORATION,)	Case No.: 25-40745
d/b/a KDHX COMMUNITY MEDIA,)	
)	<u>NOTICE AND MOTION TO EXPEDITE</u>
)	<u>HEARING ON MOTION FOR RELIEF</u>
Debtor.)	<u>FROM STAY OF LITIGATION</u>
)	
STACY BERNARD, <i>et al.</i>)	
)	Hearing Date: April 16, 2025
Movants)	Hearing Time: 10:00 am
)	Location: St. Louis; Courtroom 7N
v.)	Response Date: April 14, 2025
)	
DOUBLE HELIX CORPORATION,)	
d/b/a KDHX COMMUNITY MEDIA,)	
)	
Respondent.)	

NOTICE

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY AS SET FORTH ABOVE.

YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

MOTION

COMES NOW Stacy Bernard *et al* (collectively, “Movants”), by and through their undersigned counsel, and state as follows in support of their Motion to Expedite Hearing on their Motion for Relief From Stay of Litigation:

1. Movants have filed a Motion for Relief from Stay of Litigation (the “Motion”) and seek a hearing thereon on April 16, 2025 at 10:00 am.

2. As set forth in greater detail in the Motion, Movants Bernard, *et al.*, but for creditor Jon Valley, are Plaintiffs in *Bernard, et al. v. Double Helix Corp., et al.*, Cause No. 2422-CC00192 (Circuit Court, City of St. Louis), filed Jan. 29, 2025 (the “State Court case”).

3. In that case, Movants seek rulings on the certain actions taken by Debtor and by the individual Board members.

4. Movants seek a hearing on the Motion on an expedited basis because the rulings sought in the State Court case are critical to a determination of the validity of the members’ rights, ongoing disenfranchisement, and the validity of certain actions taken before and during this case.

5. Movants’ desire is to bring this bankruptcy case to a successful reorganization of the Debtor so that it can continue to provide the unique nonprofit and music experience to the St. Louis area that it has provided for so many years.

6. The relief requested in the Motion is necessary to allow that reorganization to occur.

7. Debtor has indicated his consent to having the Motion heard as set forth above.

WHEREFORE, Movants hereby respectfully request the Court enter an Order granting this Motion to Expedite Hearing on their Motion for Relief from Stay, setting the Motion for hearing on April 16, 2025, with any objections or other responses due no later than April 14, 2025, and providing for such other and further relief as this Court deems just and proper.

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ATTORNEYS FOR MOVANTS

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2025, a copy of this document was served electronically upon filing on all parties listed on the Court's Electronic Mail Notice List via the Court's CM/ECF System and was served by first class mail or other means indicated on the parties at the addresses listed on the attached mailing list.

/s/ A. Thomas DeWoskin
A. Thomas DeWoskin